



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

February 14, 2024

**BY ECF**

The Honorable Katherine Polk Failla  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**MEMO ENDORSED**

Re: *Maritime Legal Solutions v. U.S. Transp. Command*, No. 23 Civ. 7045 (KPF)

Dear Judge Failla:

This Office represents defendant the United States Transportation Command in the above-referenced action brought pursuant to the Freedom of Information Act (“FOIA”). I write respectfully, together with the plaintiff, to request that the initial pretrial conference presently scheduled for February 22, 2024 (Dkt. No. 16) be rescheduled to the week of March 25, 2024, or a time thereafter that is convenient for the Court, with a corresponding extension of time for the parties’ preconference submissions, currently due February 15.

This is the third request by either party to adjourn the conference; the Court granted the two prior requests. Defendant previously made a production of documents in response to the FOIA request. After consultation with plaintiff’s counsel, Defendant is exploring whether additional documents may be released and will be preparing a *Vaughn* index. In the interest of efficiency, the requested adjournment will allow the parties to continue their discussion regarding plaintiff’s concerns with the production and to confer regarding next steps in advance of appearing before the Court. The parties thank the Court for its consideration of this letter.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney for the  
Southern District of New York  
*Attorney for Defendant*

By: /s/ Joseph A. Pantoja  
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cc: *Counsel of record* (by ECF)

Application GRANTED. The initial pre-trial conference scheduled for February 22, 2024, is hereby ADJOURNED to **April 10, 2024**, at **10:00 a.m.** The conference will be telephonic, and the Court will provide dial-in information on the docket in advance of the proceeding.

The parties shall file their pre-conference submissions on or before **April 4, 2024**.

The Clerk of Court is directed to terminate the pending motion at docket number 17.

Dated: February 15, 2024  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE